

EXHIBIT 12

Christopher Markos

From: Elizabeth L. Kramer <ekramer@laverylaw.com>
Sent: Wednesday, March 16, 2022 3:34 PM
To: Christopher Markos; Frank J. Lavery, Jr.
Cc: Rich Raiders; Mindy S. Kushner; Aimee Paukovits
Subject: RE: Gerhart

Chris,

I was going to e-mail you today. We need a few more days to finalize our document responses. We should be able to get them to you next week. Please let me know if this is ok.

For the TigerSwan depositions, we have a letter that should be going out to you soon about that, but long story short, we are going to be representing everyone absent Porter and McKinnon. Please provide us with proposed dates for the depositions.

For the designee deposition, I was under the impression that you were tabling that until you received our document request responses and took the depositions of the individual employees and/or former employees because they may eliminate the need for a designee deposition?

Please let me know if you have any questions.

Thanks,

Elizabeth L. Kramer, Esquire

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From: Christopher Markos [mailto:cmarkos@williamscedar.com]
Sent: Wednesday, March 16, 2022 3:28 PM
To: Frank J. Lavery, Jr.; Elizabeth L. Kramer
Cc: Rich Raiders
Subject: Gerhart

Frank and Elizabeth,

Any update on (1) document production; (2) scheduling the 30(b)(6); (3) the availability of other witnesses I identified in my 2/1 letter? I think I can refine the additional individual witnesses after the 30b6, but we are going up against the clock and should get our proverbial ducks in a row.



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